

Gina Harrison  
Director  
Federal Regulatory Relations

1275 Pennsylvania Avenue, N.W., Suite 400  
Washington, D.C. 20004  
(202) 383-6423

EX PARTE OR LATE FILED

PACIFIC  TELESIS  
Group - Washington

February 23, 1995

RECEIVED

FEB 23 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

**EX PARTE**

William F. Caton  
Acting Secretary  
Federal Communications Commission  
Mail Stop 1170  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Re: *CC Docket No. 94-54 - Equal Access and Interconnection Obligations Pertaining to Commercial Radio Services*

Today, I met with Lisa B. Smith, Legal Advisor to Commissioner Andrew C. Barrett to discuss issues contained in the attached document which was used during the meeting. Please associate this material with the above-referenced proceeding.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Attachment

cc: Lisa B. Smith

No. of Copies rec'd 02  
List A B C D E

---

# ***Bringing Mobility to The Mass Market***

**L. R. Danlels**

**President, Pacific Bell Mobile Services**

---

LRD/ml 2/15/95

**PACIFIC BELL**  
Mobile Services

## ***Industry Evolution For National Roaming Service May Not Be In The Public Interest***

---

- **Today, national roaming is only available on Cellular Analog networks**
- **Large cellular companies plan to combine PCS and Cellular spectrum to create “national networks”**
- **One potential PCS provider is also pursuing a “national network”**
- **At least three different PCS technologies - TDMA, CDMA, and GSM - are likely to be deployed**
- **Customers of independent PCS carriers (i.e.; Regional and Designated Entities) may be unable to access these national networks for technological or competitive reasons**

## ***A Broad Roaming Policy Should Be Adopted***

---

- **Cooperative agreements among CMRS providers for roaming should be expected by the FCC whenever technically feasible**
- **To promote competition, the FCC should require that Cellular Carriers provide access to national analog roaming services on a fair and nondiscriminatory basis**

## ***Interconnection***

---

- **Wait to see market evolution**
- **Mandatory interconnection may increase operators' expenses**
- **Multiple connections between CMRS providers could reduce service quality**

## ***Reseller Switch Unfair***

---

- **Reseller switch unnecessary in highly competitive market**
- **MTA 30 MHz PCS providers are paying for spectrum**
- **Alters economics and is unfair to bidders**